



December 8, 2003

Mr. Nabil S. Fayoumi
U. S. Environmental Protection Agency - Region 5
Superfund Division
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Schedule Extension
Slurry Wall Excavation, Sauget Area 2, Sauget, Illinois**

Dear Mr. Fayoumi:

Solutia is sending this letter pursuant to paragraph 85, Section XIX of the September 30, 2002 UAO.

As I stated in our meeting this week, the slurry wall excavation is not expected to be complete until March 30, about 11 weeks later than planned.

Due to lower than estimated productivity by the slurry wall contractor, Inquip Associates, Inc. (Inquip), the slurry wall excavation is not expected to be complete before March 30, 2004. Final backfilling of the trench will require approximately an additional 3 weeks until April 23, 2004 and demobilization and reseedling is not expected until May 10, 2004.

The major reasons for the low productivity are:

- difficulty in excavating through a layer of rocks and boulders,
- extraordinary equipment breakdowns.
- unusually wet weather

Digging through the boulders is extremely slow because they must be broken up in order to be removed from the trench. In addition to being a slow process the rock also causes teeth to break on the clamshell buckets which require time to repair. One of the clamshells was damaged so severely digging boulders that it required a week to repair. This type of maintenance and repair is beyond Inquip's experience for this equipment. In addition, the trackhoe was out of service for a week requiring an engine replacement.

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Heavy rains have slowed or stopped construction for several days on at least two occasions.

Note that once the trench is completely excavated, the wall will be fully functional as a barrier to groundwater migration. Also note that since the beginning of November, the Groundwater Migration Control System (GMCS) has met the requirements of the interim groundwater remedy. Groundwater levels have been and continue to be equal to or lower than the level of the Mississippi River.

The basis for the original bid from Inquip was to excavate 5600 sq ft /day. The average daily excavation rate through November is 3293 sq ft/day. The average rate for November is 3900 sq ft/day. The most productive week to date has been 4860 sq ft / day.

The attached Inquip schedule is based on achieving a 4050 sq ft/day and accounts for working 24 hours /day and for Holidays. It does not account for days when excavation may not take place due to weather or equipment breakdowns. To date Inquip has had two major breakdowns. The trackhoe was out of service for 1 week and one of the clamshells was out of service for 1 week.

Through November Inquip has excavated on 41 days. Since the scheduled start date of September 2, there have been 61 scheduled workdays excluding weekends. Inquip has worked several Saturdays and still has been able to excavate on only 67% (41 days / 61 days) of the originally scheduled days.

On the days worked, average productivity has only been 59% efficient (3293 sq ft / 5600 sq ft).

Based on the above, the trench should be about 39.5% complete (i.e. 59% x 67%).

Actual % excavation complete is 162,718 sq ft / 445,500 sq ft = 36.5% complete.

Solutia has taken actions over the past several weeks in an attempt to improve productivity and shorten the schedule. We required Inquip to mobilize the mechanical clamshell and we required them to begin a two shift operation. These actions in conjunction with the extended schedule will increase Solutia's cost by more than \$1,500,000. We are doing everything we can to complete this project as expeditiously as possible.

We will continue to monitor the work closely and will look for opportunities to increase productivity.

If you have any questions, please call me.

Sincerely,

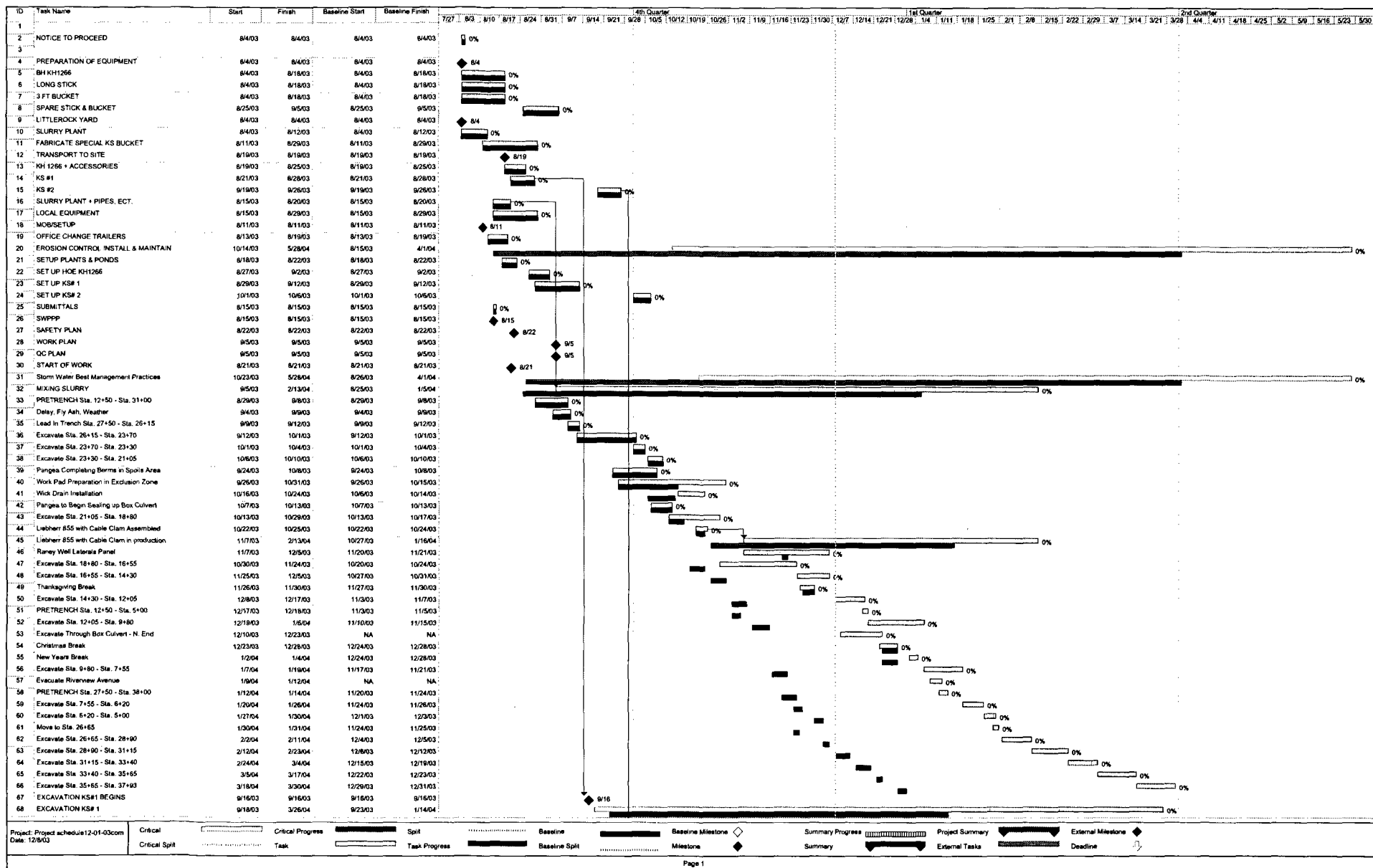
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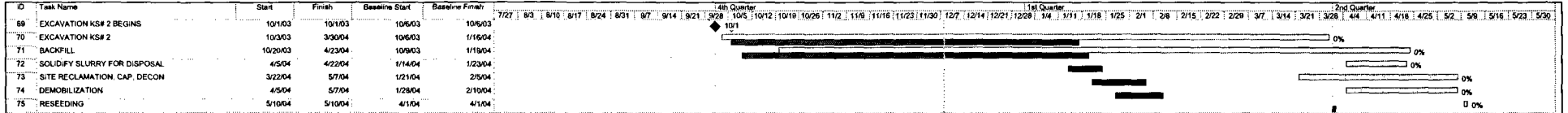
Solutia Inc.

Gary W. Vandiver
Project Coordinator

cc. Sandra Bron - IEPA
Ken Bardo - USEPA
Bruce Yare – Solutia
Cathy Bumb - Solutia

Linda Tape - Husch & Eppenberger
Richard Williams - Solutia
Peter Barrett – CH2M Hill
Tom Martin - USEPA





Project: Project schedule12-01-03com
Date: 12/6/03

Critical
Critical Split

Critical Progress
Task

Critical Progress
Task

Split
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Baseline
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Baseline
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Baseline Milestone
Milestone

Baseline Milestone
Milestone

Summary Progress
Summary

Summary Progress
Summary

Project Summary
External Tasks

Project Summary
External Tasks

External Milestone
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